

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION

United States District Court  
Southern District of Texas  
FILED

NOV - 7 2016

STATE OF TEXAS,

ROBIN CLARICE PAREZANIN,  
RHONDA FLEMING,  
Plaintiff-Intervenors,

David J. Bradley, Clerk of Court

v.

No. B-14-254

UNITED STATES OF AMERICA, et al.

MOTION TO PROCEED INFORMA PAUPERIS ON APPEAL

The Plaintiff-Intervenors move the Court to proceed in forma pauperis on appeal.

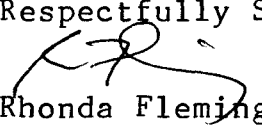
The appeal is not frivolous. A reporter with the "Washington Times," Stephen Dinan, has reported on the case. Exhibit-A, Washington Times Story.

The Plaintiff-Intervenors raise a valid equal protection claim, that DAPA beneficiaries admit to illegal conduct, violation of federal law, by applying for lawful presence. In addition, when the Plaintiff-Intervenors are released, they will have to compete with these illegal aliens for a job, with a felony record, while these persons who broke the law will have a clear record. In the State of Texas, they will have the right to lawfully own a firearm.

The Plaintiff-Intervenors are indigent and swear to this fact under penalty of perjury, 28 U.S.C. § 1746.

For the reasons presented above, the Plaintiff-Intervenors move the Court to grant in forma pauperis status on appeal.

Respectfully Submitted,

  
Rhonda Fleming, Plaintiff  
October 31, 2016

TRULINCS 20446009 - FLEMING, RHONDA ANN - Unit: CRW-I-S

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FROM: Forbes, Lawrence  
TO: 20446009  
SUBJECT: The Washington Times  
DATE: 10/30/2016 07:51:02 AM

Inmates say prison made them watch Hillary Clinton s speech, blacked out Donald Trump s

Felons ask to join Obama deportation amnesty case, be set free

By Stephen Dinan - The Washington Times - Thursday, September 8, 2016  
Stephen Dinan can be reached at [sdinan@washingtontimes.com](mailto:sdinan@washingtontimes.com).

Federal convicts told a judge they were forced to watch Hillary Clinton s convention speech at the federal prison where they re being held but said the prison imposed a blackout on Donald Trump s speech, tuning the facility s televisions to other channels. The felons are trying to join the federal case against President Obama s 2014 deportation amnesty, saying that Mr. Obama is discriminating against U.S. citizens caught breaking the law by punishing them, even as he attempts to grant work permits and taxpayer-funded benefits to illegal immigrants. In filings in a federal court in Texas, the four female convicts one of whom, in a bizarre twist, is serving time for smuggling illegal immigrants said they need to be set free to fight their case. They said prison officials and other inmates are targeting them for their political beliefs, and particularly their support for Mr. Trump, the GOP presidential nominee. "On the night of Hillary Clinton s acceptance speech at the Democratic National Convention, special accommodations were made, where every television in the housing units were placed on the channel where her speech was televised," the convicts said. But they said they were not allowed "a television to watch Mr. Donald Trump give his acceptance speech." The women are being held at Federal Medical Center-Carswell in Fort Worth, Texas.

The federal Bureau of Prisons refused to answer questions about the situation, insisting officials couldn t comment because of the ongoing court case in Texas over Mr. Obama s deportation amnesty. The women, however, said the prison both officials and prisoners themselves is overwhelming pro-Clinton, and they fear for their safety as Trump supporters. One of the four, Rhonda Ann Fleming, said she wrote a letter to the Trump campaign complaining about illegal immigration, and when she received a response, both prison employees and other prisoners accosted her "in a hostile manner." "Every illegal alien prisoner at FMC Carswell states that as soon as they are released they are coming right back to the United States because President Obama and Hillary Clinton are not going to deport them," the four women said.

They are asking to be allowed to join the lawsuit against Mr. Obama s deportation amnesty, which is pending in the court of Judge Andrew S. Hanen. Judge Hanen issued an injunction blocking the amnesty, and that has been upheld by an appeals court and, earlier this year, by the Supreme Court in a 4-4 tie ruling. The convicts say it is unfair that illegal immigrants who broke the law roam freely in the U.S., while they are incarcerated. They asked either to be released or sent to a halfway house while their case is pending. Judge Hanen has yet to rule on any of their requests. Lawyers for the government and some illegal immigrants granted three-year amnesties under Mr. Obama s program oppose the women, saying they don t have a case. "It is very likely that allowing intervention would lead to numerous additional frivolous filings and delays," Nina Perales, a lawyer with the Mexican American Legal Defense and Educational Fund who is representing illegal immigrants in the case, said in her reply brief. She also blasted Fleming, saying the woman is in prison for fraud and has a history of filing long shot cases that courts have rejected.. Fleming is serving a 30-year sentence for Medicare fraud, while Raheleh Ziaei is serving eight months for drug possession, and Tammy Willis is serving six months for what she calls a property crime. The fourth convict, Robin Clarice Parezanin, is serving a 30-month sentence after she pleaded guilty to smuggling an illegal immigrant. According to federal agents, Parezanin was stopped at a border checkpoint on Interstate 8 in California in November, and agents became suspicious after her answers didn t make sense. After some prodding, she finally opened the trunk of her Ford Mustang and agents saw an illegal immigrant lying inside. One of the agents immediately slammed the trunk shut to keep the illegal immigrant from running away, but Parezanin sped off, leading agents and the California Highway Patrol on a 10-minute high-speed chase. She smashed into another car at a stoplight, then bailed out, where she was caught by the highway patrol. Meanwhile, agents captured the illegal immigrant, Jose Manuel Ochoa-Vega, who admitted he was from Mexico and had paid \$3,000 to be smuggled into the U.S. Parezanin, in court documents, complained that she s still in prison while Mr. Ochoa-Vega was set free and is back in Mexico..

EX-A

Name Rhonda Fleming  
Reg. No. 20446-009  
Federal Medical Center, Carswell  
P.O. Box 27137  
Ft. Worth, TX 76127

NOV - 2015

⇒ 20446-009 ⇒  
Federal District Clerk  
600 E Harrison ST  
Federal Courthouse  
Brownsville, TX 78520  
United States

Legal Mail

